

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No. PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
Defendants)	
_____)	

**WORLD AVENUE USA, LLC’S SECOND AMENDED MOTION FOR EXTENSION
OF TIME TO COMPLY WITH COURT ORDER**

Defendant World Avenue USA, LLC. (“WAUSA”) and its counsel, move this Honorable Court for an additional extension of time to comply with the Court’s Order (DE 428), and as grounds therefore states as follows:

1. On September 23, 2010, this Court ordered both parties to supplement all discovery, and to certify all discovery responses as complete and accurate. [DE 428] The time to respond was extended to October 26, 2010. [DE 462]

2. Due to the prolixity of the discovery materials propounded by Plaintiff Beyond Systems, Inc. (“BSI”), Defendant WAUSA must review the accuracy of over a hundred pages of discovery responses as well as certify that thousands of pages are compliant with the discovery responses. Unlike BSI, WAUSA does not routinely engage in litigating these matters, and must respond to each request on a case-by-case basis. WAUSA is in the process of supplementing its documents and discovery responses, but does require additional time to certify that such responses are complete, or to produce additional discovery.

3. As of this date, Monday, October 25, 2010, the undersigned counsel remains in New York for the trial of the matter before the Honorable Harold Baer; in the United States District, Southern District of New York; entitled *Settlement Funding, LLC v. AXA Equitable Life Insurance Company*; Case No.: 09-CV-8685(HB).

4. Co-counsel Sandy Saunders will be in Russia until Tuesday, November 2, 2010.

5. Accordingly, WAUSA and its counsel request an additional extension of time until Friday, October 29, 2010 to complete their obligations.

WHEREFORE, Defendant WAUSA respectfully requests the Court grant an additional extension of time to Friday, October 29, 2010 to supplement all discovery, and to certify all discovery responses as complete and accurate as ordered by this Court on September 23, 2010.
(DE 428)

Respectfully submitted,
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